

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

SOUTHWEST AIRLINES PILOTS
ASSOCIATION,

Plaintiff

vs.

SOUTHWEST AIRLINES CO.,

Defendant.

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CIVIL ACTION NO. 3:21-cv-02065-M

**UNOPPOSED MOTION TO EXTEND DEFENDANT
SOUTHWEST AIRLINES CO.'S DEADLINE TO FILE ANSWER OR OTHER
RESPONSIVE PLEADING & DISCLOSURE STATEMENT**

Defendant Southwest Airlines Co. (“SWA” or “Defendant”) files this unopposed motion requesting that the Court extend Defendant’s deadline to file its answer or other responsive pleading to Plaintiff Southwest Airlines Pilots Association (“SWAPA” or “Plaintiff”) Original Complaint, along with its Fed. R. Civ. P. 7.1 disclosure statement, by 14 days, to and through October 7, 2021.

Plaintiff filed its Original Complaint and Jury Demand on August 30, 2021 and served Defendant on September 2, 2021. ECF Nos. 1, 5. The current deadline by which Defendant must file its answer or other responsive pleading to Plaintiff’s Original Complaint is September 23, 2021. Defendant has retained the below-signed counsel at Morgan, Lewis & Bockius LLP to represent it in this matter.

Plaintiff’s Complaint raises factual allegations regarding the parties’ conduct during the course of the entire COVID-19 pandemic, *see* ECF No. 1, ¶¶ 16 – 40, as well as limited allegations regarding the parties’ actions prior to the pandemic. *See id.* ¶¶ 10 – 15. Given Plaintiff’s allegations, and the fact that SWA is continuing to operate under an ongoing pandemic, Defendant

seeks a 14-day extension to analyze and properly respond to Plaintiff's allegations. Plaintiff is unopposed to this extension.

Accordingly, Defendant requests that the Court grant this motion and extend the deadline by which Defendant must file its answer or other responsive pleading to Plaintiffs' Original Complaint and Jury Demand (without waiver of any claims or defenses Defendant may have), along with its Fed. R. Civ. P. 7.1 disclosure statement, from September 23, 2021 to October 7, 2021.

Dated: September 17, 2021

Respectfully submitted,

MORGAN, LEWIS & BOCKIUS LLP

/s/Robert E. Sheeder

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Attorneys for Defendant Southwest Airlines Co.

CERTIFICATE OF CONFERENCE

I hereby certify that on the 16th day of September 2021, the undersigned counsel for Defendant conferred regarding the foregoing Motion with counsel for Plaintiff, and that counsel for Plaintiff are unopposed to any of the relief requested herein.

/s/ Robert E. Sheeder

Robert E. Sheeder

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served upon all counsel of record via the Court's CM/ECF Filing System on this 17th day of September, 2021

/s/ Robert E. Sheeder

Robert E. Sheeder